

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ALEXANDER OTIS MATTHEWS,

Plaintiff,

vs.

ESTRATEGIA INVESTIMENTOS, S.A., *et al.*,

Defendants.

Case No. 1:14cv0207 LO/MSN

**DEFENDANT CENTRUM BERATUNGS- UND BETEILIGUNGEN AG'S
MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

Defendant Centrum Beratungs- und Beteiligungen AG ("Centrum B&B"), by and through its undersigned counsel, hereby moves this Court to dismiss the Amended Complaint against Centrum B&B pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6).

Further support for this Motion is detailed in the Brief In Support, filed this same day.¹

¹ Pursuant to Local Civil Rule 7(K), Centrum B&B provides the following warning to Plaintiff:

(1) The pro se party is entitled to file a response opposing the motion and that any such response must be filed within twenty-one (21) days of the date on which the dispositive or partially dispositive motion is filed; and

(2) The Court could dismiss the action on the basis of the moving party's papers if the pro se party does not file a response; and

(3) The pro se party must identify all facts stated by the moving party with which the pro se party disagrees and must set forth the pro se party's version of the facts by offering affidavits (written statements signed before a notary public and under oath) or by filing sworn statements (bearing a certificate that it is signed under penalty of perjury); and

(4) The pro se party is also entitled to file a legal brief in opposition to the one filed by the moving party.

Dated: July 31, 2017

Respectfully submitted,

/s/ Charles B. Molster, III

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*Attorneys for Defendant Centrum Beratungs-
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CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants, and I have caused a hard copy to be mailed by first class mail, postage prepaid, to the following:

Alexander Otis Matthews #24394-016
P.O. Box 9000
Berlin Federal Prison Camp
Berlin, NH 03570

/s/ Charles B. Molster, III
Charles B. Molster, III